

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STUDENT DOE NO. 1,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; the U.S.
DEPARTMENT OF HOMELAND
SECURITY; and TODD LYONS, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

Case No. 25-cv-1962

**STIPULATION AND PROPOSED ORDER FOR AN
EXTENSION OF DEFENDANTS' DEADLINE TO FILE
AN ANSWER OR OTHER RESPONSE TO THE COMPLAINT**

Plaintiff Student Doe No. 1 and Defendants Kristi Noem, in her official capacity as Secretary of Homeland Security, the U.S. Department of Homeland Security ("DHS"), and Todd Lyons, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement (Defendants), stipulate and agree, subject to the Court's approval, that the United States may have until July 30, 2025, to respond to Plaintiff's Complaint.

Plaintiff filed a Complaint on April 17, 2025, seeking declaratory and injunctive relief, as well as review under the Administrative Procedure Act of DHS's termination of Plaintiff's record in the Student and Exchange Visitor Information System (SEVIS) database. ECF No. 1. On June 4, this Court granted the Plaintiff's motion for a preliminary injunction, ordering that the relief set forth

in the Court's Order "shall remain in effect until a final order is entered in this case." ECF No. 52.

Plaintiff and the United States continue to confer about this matter and consider whether the parties can agree to resolution without the need for further litigation. The parties respectfully request that this Court approve their request for an extension of Defendants' deadline to file an answer or other response to the Complaint.

Dated: June 26, 2025

/s/ David S. Santee
DAVID S. SANTEE
Law Offices of David S. Santee, LLC
12 Veterans Square, Suite 1
Media, PA 19063
Telephone: (215) 717-8000
Facsimile: (215) 895-3995
david@santeelawoffices.com

Kasturi Sen, Esquire
Goldshaw Greenblatt Pierce LLC
O: 215-978-9090
M: 917-302-0685
ksen@ggplawfirm.com

Attorneys for Plaintiff Student Doe No. 1

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Gregory B. in den Berken
GREGORY B. IN DEN BERKEN
ERIN E. LINDGREN
ANTHONY ST. JOSEPH
Assistant United States Attorneys
Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
Phone: (215) 861-8200
Email: gregory.indenberken@usdoj.gov
erin.lindgren@usdoj.gov
anthony.stjoseph@usdoj.gov

Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STUDENT DOE NO. 1,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; the U.S.
DEPARTMENT OF HOMELAND
SECURITY; and TODD LYONS, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

Case No. 25-cv-1962

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants shall have until July 30, 2025, to file an answer or other response to the Complaint.

Dated: June __, 2025

BY THE COURT:

CYNTHIA M. RUFÉ, J.

CERTIFICATE OF SERVICE

I certify that on this 26th day of June 2025, a true and correct copy of the foregoing Stipulation and Proposed Order for an Extension of Defendants' deadline to file an answer or other response was filed electronically via the Court's CM/ECF system and served via CM/ECF on all counsel of record.

/s/ Gregory B. in den Berken
GREGORY B. IN DEN BERKEN
Assistant United States Attorney